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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

OPPOSITION TO PRODUCING THE ENTIRE ADMINISTRATIVE FILE

Koniag joins in Leisnoi's Opposition at Docket 192 to Plaintiff's Motion for Order Directing the Federal Defendant to File a Complete Administrative Record at Docket 177. It also joins in the Opposition soon to be filed by Secretary Kempthorne, and adopts the reasons set out by both fellow defendants.

Further, Koniag draws this Court’s attention to its Memorandum in Support of Motion to Dismiss at Docket 145, pages 3-4, where Koniag stated that if the Secretary’s decision on mootness is reversed, then, before this Court begins review of the massive administrative record, it necessarily must reach the issue that it would have no final

agency action as to the remainder of Mr. Stratman's allegations. Before both of these issues are determined, filing the full administrative record is premature. After all, if the Court overrules Secretary Kempthorne's decision on mootness, and directs the Secretary to reach the other issues so this Court has a final Agency action to review, the Federal defendant would have first sent the administrative record here and then be required to send the administrative record back to the Secretary.

DATED at Anchorage, Alaska this 13th day of July, 2007.

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By /s/ R. Collin Middleton

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Certificate of Service

The undersigned certifies that the Foregoing document was served Electronically on this 13th day of July, 2007.

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